

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

GRACE ESTABROOK, ELLEN)	
HOLMQUIST, and MARGOT)	
KACZOROWSKI,)	
)	
Plaintiffs,)	
)	Case No. 1:25-cv-10281-WGY
v.)	
)	
THE IVY LEAGUE COUNCIL OF)	
PRESIDENTS, PRESIDENT AND)	
FELLOWS OF HARVARD COLLEGE,)	
TRUSTEES OF THE UNIVERSITY OF)	
PENNSYLVANIA, and NATIONAL)	
COLLEGIATE ATHLETIC)	
ASSOCIATION,)	
)	
Defendants.)	

MOTION TO DISMISS BY THE IVY LEAGUE COUNCIL OF PRESIDENTS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant The Ivy League Council of Presidents (“The Ivy League”) hereby respectfully moves this Court to dismiss the complaint filed by plaintiffs Grace Estabrook, Ellen Holmquist, and Margot Kaczorowski. The complaint does not allege that The Ivy League receives Federal financial assistance and, in turn, fails to allege that Title IX applies to The Ivy League. Further, the allegations in the complaint do not amount to discrimination on the basis of sex. Accordingly, the complaint fails to state a claim and must be dismissed.

In further support of this motion, The Ivy League relies upon its Memorandum in Support of its Motion to Dismiss, filed herewith.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), The Ivy League respectfully requests oral argument on this Motion.

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, counsel for The Ivy League met and conferred with counsel for plaintiffs in good faith to resolve or narrow the issues raised in the Motion, but was unable to do so.

Dated: April 21, 2025

/s/ Stephen J. Kastenberg

Stephen J. Kastenberg (admitted *pro hac vice*)

Elizabeth P. Weissert (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of this document was filed through the Electronic Case Filing system and will be served upon the attorney of record for each party registered to receive electronic service this 21st day of April, 2025.

/s/ Stephen J. Kastenberg
Stephen J. Kastenberg